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September 3, 2015

BY ECF

Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Almazo, et al. v. Energy Resources Personnel LLC, et al.
15-cv-4158 (JGK)

Your Honor:

I am an attorney with the office of Michael Faillace & Associates, attorneys for Plaintiffs in the above-referenced matter. Plaintiffs write jointly with Defendants to respectfully request: (a) an adjournment of the pre-motion and initial conference presently scheduled for September 8, 2015 at 4:30 p.m. to a date on or after November 9, 2015; and (b) that the Court refer this matter to a Magistrate Judge for the purpose of conducting a settlement conference. This is the parties' second request for an adjournment of the pre-motion and initial conference.

The parties have conferred and believe a period of informal exchange of documents and settlement discussions would be conducive to a prompt and efficient resolution of this action. In addition, Plaintiffs intend to file an amended complaint in this matter, both to address the concerns raised by Defendants' proposed partial motion to dismiss and to add additional party plaintiffs in this action, which may make the pre-motion conference moot and would make an initial conference inefficient at this time. Accordingly, the parties request a referral to a magistrate judge for the purpose of a settlement conference within the next sixty days. The parties are confident that referral to a magistrate judge for early settlement discussions will resolve this matter with minimal court involvement.

The parties thank the Court for its time and attention to this matter.

Respectfully Submitted,

/s/
Shawn Clark
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Attorneys for Plaintiffs

cc: (By ECF)
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